



DEPARTMENT OF THE AIR FORCE
30TH SPACE WING (AFSPC)

6 July 2016

MEMORANDUM FOR MR. MIKE ESHAGHLIAN
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SOUTHERN CALIFORNIA PERMITTING BRANCH

FROM: 30 CES/CEIEC
1028 Iceland Avenue
Vandenberg AFB CA 93437-6010

SUBJECT: Vandenberg Air Force Base (VAFB) Explosive Ordnance Disposal (EOD) Range
RCRA TSD Part 'B' Permit Cancellation and Continued Training Range Operation

1. The RCRA Part B EOD Treatment Facility Permit, (EPA I.D. CA9570025149), located at Vandenberg AFB California, expires in May 2018. The Installation Management Flight (30 CES/CEI) is assigned as the regulatory compliance point-of-contact for all issues related to this permit and seeks DTSC guidance to determine the permit cancellation process and status change to a non-permitted EOD Flight (30 CES/CED) training range. 30 CES/CEI proposes that the 2016 EOD Range Assessment functions as-part of the permit Closure Plan process.

2. Whether an emergency response or a planned operation, all controlled detonations or on-range destruction of propellants, explosives, and/or pyrotechnics (PEP) conducted by the VAFB EOD Flight personnel are currently managed under the training exercise exemption and logged as "Explosive Proficiency and Emergency Detonation Training" as described in Air Force Instruction (AFI) 32-3001, and therefore should not be regulated under or require an EPA permit. Training is an excluded and non-regulated activity and not part of the permit requirements. The current mode of EOD Flight Operations at the permitted range consists of each detonation and operation functioning and officially listed as logged training exercises for EOD Flight personnel under Air Force Instruction readiness for active duty worldwide deployments.

3. Munitions associated with Legacy Missile Programs promulgated the need for the original Part 'B' OD/OB Permit. The cancellation and phase-out of these weapon-system vehicle launch programs no longer support the need for the resubmittal of the May 2018 Facility Permit Application package. As well, the continuance of this permit is no longer economically viable. There is a marked and significant downward trend in the annual Net Explosive Weight (NEW) disposed under the training exercise umbrella. The six-year trend is noted below:

- a. 2016: 0.0 lbs. (as of 5 July)
- b. 2015: 0.6 lbs.
- c. 2014: 8.09 lbs.
- d. 2013: 49.07 lbs.
- e. 2012: 12.27 lbs.
- f. 2011: 51.05 lbs.

4. To put these totals in perspective, the Vandenberg AFB RCRA Part B EOD Treatment Facility Permit allows up to 500 lbs. of treatment per/day. The combined six-year volume listed above of 121.08 lbs. is 24.2 percent of a single days permitted limit. The permitted cost of "disposal" for the six-year period equals \$362,850.00 or an average of \$2,997 per/lb. This average does not take into account the annual Range Assessment (sampling and analysis) or EOD Flight HAZWOPER training.

5. On 14 April 2014, EPA Region 9 conducted an unannounced compliance evaluation inspection of the VAFB Hazardous Waste Program and specifically the RCRA Part B permitted TSD/EOD Range and EOD Operations Flight. Chief inspector during the April 2014 compliance assessment was Mr. Russ Frazier, Lead Inspector with the EPA Region 9 Waste and Chemical Section/Enforcement Division. Mr. Frazier was accompanied by the Santa Barbara County CUPA inspector, Mr. Gary Browne for a joint inspection. Mr. Frazier suggested and recommended that the base (VAFB) and 30 CES/CEI, move forward and initiate the cancellation of the RCRA Part B Permit while at the same time continue EOD operations as a training range. The rationale for the EPA recommendation was formulated after lengthy discussions of the history and original need for the permitted range, past range operations, the scope of historical launch vehicle operations and subsequent multiple program cancellations, marking the end of the large Air Force based programs and associated high potential for required EOD disposals.

6. Mr. Frazier recommended and VAFB concurs, that the EOD Range will continue to be required to operate as a "training range" and that 30 CES/CEI should engage with DTSC to explore this way-ahead and work to cancel the RCRA Part B permit. In the eventuality of complete EOD Range closure, the responsibility of long-term monitoring, corrective action and clean-up would be transferred to the VAFB Installation Restoration Program and managed under the Federal Facilities Site Remediation Agreement (FFSRA) for VAFB with the DTSC and the Regional Water Quality Control Board.

7. I appreciate your time and consideration. Should you have any further questions or comments regarding this submittal, please contact me at 606-2359 or email at daniel.carson.1@us.af.mil.



DANIEL CARSON
30 CES/CEIEC
Hazardous Waste Program Manager
Installation Management Flight

Attachment:
FFSRA